

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

TYLER PHAM,

*Defendant.*

Criminal No. 1:21-CR-66

Count 1:  
Conspiracy to Distribute Controlled  
Substances  
(21 U.S.C. §§ 841(a)(1) and 846)

Forfeiture Notice



INDICTMENT

April 2021 Term — Alexandria

COUNT ONE

*(Conspiracy to Distribute Controlled Substances)*

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

1. Having determined that “[t]he illegal importation, manufacture, distribution and possession and improper use of controlled substances have a substantial and detrimental effect on the health and general welfare of the American people[,]” Congress enacted the Controlled Substances Act (CSA), codified at Title 21, United States Code, Sections 801 *et seq.*

2. There are five “schedules” of controlled substances, known as Schedule I, II, III, IV, and V. Substances are “scheduled” depending on their potential for abuse and recognized medical usage.

3. A drug listed in Schedule II has a high potential for abuse and may lead to severe psychological or physical dependence; however, a Schedule II drug has a currently accepted medical use in the United States, subject to severe restrictions. 21 U.S.C. § 812, *et seq.*

4. Methamphetamine is a Schedule II controlled substance. Title 21, United States Code, Section 812.

5. Fairfax County, among other municipalities, is located within the Eastern District of Virginia.

6. Drug dealers often maintain locations, including their residences, where they can keep large quantities of drugs, repackage drugs for resale, and store other items associated with drug trafficking, including firearms, ammunition magazines, and ammunition.

#### THE CONSPIRACY

7. Beginning at least in and around May 2019, and continuing thereafter up to and including December 2019, the exact dates being unknown, in Fairfax County, Virginia, within the Eastern District of Virginia, and elsewhere, the defendant, TYLER PHAM (“PHAM”), did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with others both known and unknown, to unlawfully, knowingly, and intentionally distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

#### OBJECT OF THE CONSPIRACY

8. The primary purpose of this conspiracy was for PHAM and his co-conspirators to make money through the nationwide sale of tablets held out as Adderall—but actually containing methamphetamine—through the dark net vendor Addy4cheap. The defendant used the following ways, manners, and means—among others—to carry out this purpose.

WAYS, MANNER, AND MEANS

9. It was part of the conspiracy that the defendant and his co-conspirators would and did play different roles in the conspiracy.

10. The defendant asked a co-conspirator to establish the vendor profile for the moniker of Addy4cheap on the dark net market Empire Market. Addy4cheap was also established on the dark net market Cryptonia. On these two sites, through Addy4cheap, the defendant advertised for sale peach tablets with markings of “A D” and “30” resembling 30 milligram Adderall.

11. The defendant had a source of supply for these tablets in Texas from whom he arranged for the shipment of thousands of tablets to the Eastern District of Virginia.

12. The defendant ordered and arranged for the shipment of thousands of tablets from his supplier in Texas to the Eastern District of Virginia.

13. Once in the Eastern District of Virginia, the tablets were packaged and mailed to customers nationwide who paid with cryptocurrency.

14. The defendant recruited other individuals to carry out different functions such as creating the Addy4cheap profile, packaging and mailing the narcotics, and processing orders received.

15. The defendant maintained, along with others, a source of supply of tablets both at his residence in Fairfax County, Virginia and later at the homes of other co-conspirators.

ACTS IN FURTHERANCE OF THE CONSPIRACY

16. In furtherance of the conspiracy and to bring about the objects and goals of the conspiracy, the defendant committed overt acts in the Eastern District of Virginia and elsewhere, including but not limited to the following:

17. Beginning in late August 2019, investigators began to conduct undercover drug purchases from Addy4cheap via the Empire Market. Later in the investigation, investigators made undercover purchases from Addy4cheap on Cryptonia as well. Several packages of narcotics were sent to the investigators via First Class Mail and the tablets were received several days after the undercover investigator ordered them. The below table lists the undercover purchases from Addy4cheap.

<b>Date Ordered</b>	<b>Dark Market</b>	<b>Number of Tablets</b>	<b>Location Mailed To</b>
8/24/2019	Empire	11	Fairfax County, VA
8/28/2019	Empire	20	Prince William County, VA
9/1/2019	Empire	10	Fairfax County, VA
9/5/2019	Empire	16	Prince William County, VA
9/12/2019	Cryptonia	20	Loudoun County, VA
9/23/2019	Cryptonia	40	Loudoun County, VA
9/24/2019	Empire	10	Fairfax County, VA
9/30/2019	Empire	20	Prince William County, VA
10/1/2019	Cryptonia	20	Providence, RI
N/A <sup>1</sup>	Cryptonia	20	Providence, RI
10/9/2019	Empire	30	Anne Arundel County, MD
10/15/2019	Empire	200	Prince William County, VA
10/21/2019	Cryptonia	20	Providence, RI
10/22/2019	Cryptonia	20	Loudoun County, VA
10/29/2019	Cryptonia	100	Loudoun County, VA

<sup>1</sup> It is noted that there is no ordered date listed for one of the undercover drug purchases. The undercover investigator ordered 20 tablets on October 1, 2019 and asked for the tablets to be mailed to a Providence, Rhode Island address. The shipment arrived and a second package was mailed shortly thereafter with the same quantity of tablets.

<b>Date Ordered</b>	<b>Dark Market</b>	<b>Number of Tablets</b>	<b>Location Mailed To</b>
11/5/2019	Empire	Ordered 20, Received 24	Prince William County, VA
11/6/2019	Cryptonia	20	Prince William County, VA
11/12/2019	Cryptonia	20	Prince William County, VA
11/19/2019	Empire	100	Prince William County, VA
11/21/2019	Empire	19	Prince William County, VA
11/27/2019	Empire	27	Anne Arundel County, MD

18. On or about September 24, 2019, the defendant carried over \$30,000 in U.S. Currency to Ronald Reagan Washington National Airport. A drug detecting K-9 alerted to the money carried by the defendant and the money was seized by law enforcement.

19. On or about December 9, 2019, the defendant possessed with the intent to distribute 95 peach colored tablets and 100 tablets resembling MDMA at his residence. The peach colored tablets resembled those advertised on Addy4cheap's vendor pages as well as the tablets obtained through the above-outlined controlled purchases. The 95 peach tablets were tested and confirmed to contain methamphetamine. Both sets of tablets were inside black foil pouches which is packaging material consistent with that used in all of the controlled buys described in further detail above. In addition to the tablets, investigators observed a note that read "Get crypto money \$" tacked on a bulletin board in the office area as well as a money counter and a scale.

20. On or about December 9, 2019, at the residence of Hon Lam Luk, one of the defendant's co-conspirators, Luk possessed with the intent to distribute over 2.1 kilograms of peach tablets consistent with those advertised on addy4cheap's vendor pages and obtained through controlled purchases. The 2.1 kilograms of tablets equated to over 6,600 tablets. These tablets were lab tested and confirmed to contain methamphetamine. In addition to the narcotics,

investigators seized packaging material consistent with the undercover drug purchases to include padded envelopes.

(All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.)

FORFEITURE NOTICE

The GRAND JURY HEREBY FINDS probable cause that the property described in this NOTICE OF FORFEITURE is subject to forfeiture pursuant to the statutes described:

Pursuant to Fed. R. Crim. P. 32.2(a), the defendant, TYLER PHAM, is hereby notified that if convicted of the controlled substance offense alleged in Count One of the Indictment, the defendant, TYLER PHAM, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a), the following: (1) any property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and (2) any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

Pursuant to Fed. R. Crim. P. 32.2(a), the defendant, TYLER PHAM, is hereby notified that if convicted of any of the violations set forth in this Indictment, he shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in or used in such violation.

(CONTINUED ON THE FOLLOWING PAGE)

Pursuant to 21 U.S.C. § 853(p), the defendant, TYLER PHAM, shall forfeit substitute property, if, by any act or omission of the defendant, TYLER PHAM, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with 18 U.S.C. § 924(d)(1), 21 U.S.C. § 853,  
28 U.S.C. § 2461(c); and Fed. R. Crim. P. 32.2(a))

A TRUE BILL  
Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

---

Foreperson

Raj Parekh  
Acting United States Attorney

By:



---

Jay V. Prabhu  
Bibeane Metsch  
Assistant United States Attorneys